

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BASSEY B. NDEMENOH, : **NOTICE OF MOTION TO DISMISS**
Plaintiff, : **AMENDED COMPLAINT**
: **20-CV-4492 (RA)**
- against - :
VINCENT BOUDREAU, WILLIAM C. :
THOMPSON, JR., ANTHONY LAPERUTA, :
WENDY THORNTON, GEORGE RHINEHART, : **ORIGINAL FILED BY ECF**
and TANNI BAIDYA, :
Defendants. :
: X-----

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all other proceedings and filings herein, the undersigned, on behalf of Defendants VINCENT BOUDREAU, WILLIAM C. THOMPSON, JR., ANTHONY LAPERUTA, WENDY THORNTON, GEORGE RHINEHART, and TANNI BAIDYA (collectively, the “Defendants”), will move this Court before the Honorable Ronnie Abrams, at the United States District Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Amended Complaint in its entirety and with prejudice for failure to state a claim, and for such further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s Special Rules & Practices in Civil *Pro Se* Cases, Plaintiff’s opposition papers are due within four weeks of service of Defendants’ motion papers, and Defendants’ reply papers are due within two weeks of receipt of Plaintiff’s opposition papers.

Dated: New York, New York
April 16, 2021

Respectfully submitted,

Letitia James
Attorney General
State of New York
Attorney for Defendants
By:

/s/ JOHANE SEVERIN
Johane Severin
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